

Atty. Docket No. IDF 1415 (4000-00900)**Patent****REMARKS*****Status of claims***

Claims 1-14 are currently pending in this application.

35 USC § 103 Rejection

Claims 1-14 stand rejected under 35 USC § 103 as obvious over *Hartley* (6,532,465) in view of *Dong* (6,499,023) alone or in further combination with *McComb* (6,006,224) or *Brownell* (6,009,266). Applicants respectfully traverse this rejection on the basis that the Examiner has failed to establish a *prima facie* case of obviousness. According to MPEP § 2142, three basic criteria must be met to establish a *prima facie* case of obviousness:

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

Assuming that the combination of *Hartley* and *Dong* is proper (without conceding such), Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness because the prior art relied upon does not teach or suggest all the claim limitations. Specifically, the Examiner relies upon *Dong* as teaching a database wrapper providing an additional abstraction layer between the domain object factory and the business component. Upon careful examination, *Dong* does not teach or suggest such element. More specifically, the Examiner relies on col. 5, lines 23-48 (emphasis added):

An abstraction layer 106 is provided between the decision engine 104 and the external components 108 so that the decision engine 104 may communicate with and control the external components using a high level communication protocol,

Atty. Docket No. IDF 1415 (4000-00900)

Patent

without the need to deal with the particular communication protocols of each of the different external components. This is particularly useful because the external components 108 will generally be heterogeneous with different components being manufactured by different companies. The abstraction layer 106 includes an integrated view 122, system wrappers 124, and data source wrappers 126. The system wrappers 124 provide abstract interfaces to the external components 108, exposing properties relevant to the workflow application while hiding irrelevant details concerning particularities of the components' interfaces and aspects of the components' behavior. The data source wrappers 126 provide abstract interfaces to the databases and reporting features of the other external components 108, exposing relevant data and update capabilities. The integrated view 122 provides a unified interface to the functionalities supported by the external components 108, using abstract data types or similar interfacing modules. For example, the integrated view 122 may expose a functionality without exposing what components the functionality is implemented by, and expose a computed data set without showing what databases the raw data is residing on.

As explained from this text, the abstraction layer 106 is a single abstraction layer comprising data source wrappers 126 abstracting underlying databases 120 from decision engine 104. This single database abstraction layer disclosed by *Dong* is identical to the single database abstraction layer disclosed by *Hartley*, as shown by the following chart:

<i>Dong</i> Fig. 1	<i>Hartley</i> Fig. 5
Decision Engine 104	Business Object Factory 58
Data Source Wrappers 126	Domain Object Factory 60
Database 120	Data Store 65

As can clearly be seen from this chart, *Hartley* and *Dong* each provide a single abstraction layer (i.e., domain object factory 60 and data source wrappers 126, respectively) to an underlying datastore. This single abstraction layer is not the same as a database wrapper

Atty. Docket No. IDF 1415 (4000-00900)**Patent**

providing an additional abstraction layer between the domain object factory and the business component, as recited in the pending claims. Therefore, the Examiner has failed to establish a *prima facie* case of obviousness as to the pending claims because a recited element is missing from the combination of *Hartley* and *Dong*. Applicants respectfully submit that claims 1-14 are in condition for allowance.

Request for Interview

Applicants respectfully point out that this application has been in prosecution for nearly two years and that this is the fourth different combination of prior art that Applicants have faced, as outlined below:

<u>Office Action</u>	<u>Art relied upon by Examiner</u>
06/20/02	<i>Gupta; Carter; McComb</i>
12/06/02	<i>Rowman-Amuah; Brownell</i>
04/29/03	<i>Hartley; McComb; Brownell</i>
11/04/03	<i>Hartley; McComb; Brownell</i>
01/16/04	<i>Hartley; Dong; McComb; Brownell</i>

Applicants respectfully submit that this application is well deserving of a notice of allowance. Therefore, in the event that the Examiner requires further clarification, Applicants respectfully request a telephonic interview to discuss the contents of the prior art of record and the pending claims. Applicants likewise request the courtesy of a telephonic interview prior to issuance of the next office action in the event that the Examiner elects to maintain the rejection over *Hartley* as the primary reference in combination with other references.

Atty. Docket No. IDF 1415 (4000-00900)

Patent

CONCLUSION

The Commissioner is hereby authorized to charge payment of any further fees associated with any of the foregoing papers submitted herewith, or to credit any overpayment thereof, to Deposit Account No. 21-0765, Sprint.

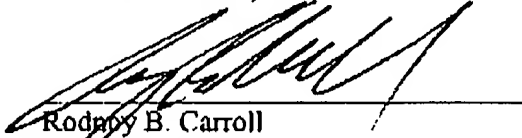
Applicants respectfully submit that the present application as amended is in condition for allowance. If the Examiner has any questions or comments or otherwise feels it would be helpful in expediting the application, he is encouraged to telephone the undersigned at (972) 731-2288.

Respectfully submitted,

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Date: 4-16-04

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